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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

IN RE: EX PARTE APPLICATION OF EURASIAN NATURAL RESOURCES CORPORATION LIMITED PURSUANT TO 28 U.S.C. § 1782 FOR LEAVE TO TAKE DISCOVERY FOR USE IN FOREIGN PROCEEDINGS

Applicant.

Case No. 1:20-mc-00312-ER

Hon. Edgardo Ramos

DECLARATION OF LAURA R. HANDMAN IN SUPPORT OF RESPONDENT HARPERCOLLINS PUBLISHERS, LLC'S MOTION TO QUASH SUBPOENA OR, IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER

I, Laura R. Handman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

- 1. I am an attorney at law duly licensed to practice before this Court. I am a partner in the firm of Davis Wright Tremaine LLP, counsel for HarperCollins Publishers, LLC ("HarperCollins US"). I submit this declaration in support of HarperCollins US' Motion to Quash Subpoena, or in the Alternative, for a Protective Order.
- 2. Attached hereto as Exhibit A is a true and correct copy of the Particulars of Claim filed by Petitioner Eurasian Natural Resources Corporation Limited ("ENRC") in the case of *Eurasian Natural Res. Corp. v. Mark Hollingsworth*, Claim No. BL-2019-001955, based in the United Kingdom.
- 3. Attached hereto as Exhibit B is a true and correct copy of the Particulars of Claim filed by ENRC in the case of *Eurasian Natural Res. Corp. v. The Director of the Serious Fraud Office*, Claim No. BL-2019-000613, based in the United Kingdom.

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4. Attached hereto as Exhibit C is a true and correct copy of the Amended Particulars

of Claim filed by ENRC in the case of Eurasian Natural Res. Corp. v. Dechert LLP and David

Neil Gerrard, Claim No. CL-2017-000583, based in the United Kingdom.

5. Attached hereto as Exhibit D is a true and correct copy of the Amended Particulars

of Claim filed by ENRC in the case of Eurasian Natural Res. Corp. v. Ake-Jean Qajygeldin, Claim

No. BL-2019-001377, based in the United Kingdom.

6. Attached hereto as Exhibit E is a true and correct copy of the Amended Subpoena

that ENRC served upon me as counsel for HarperCollins US on November 12, 2020.

7. Attached hereto as Exhibit F is a true and correct copy of the Amended Defence

filed in the case of Eurasian Natural Res. Corp. v. Dechert LLP and David Neil Gerrard, Claim

No. CL-2017-000583, based in the United Kingdom.

8. Attached hereto as Exhibit G is a true and correct copy of the transcript of this

Court's pre-motion conference, held on October 27, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 24, 2020

Washington, DC

/s/ Laura R. Handman

Laura R. Handman

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